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**PROPOSED ATTORNEYS FOR THE DEBTORS
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**IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE NORTHERN DISTRICT OF TEXAS
 FORT WORTH DIVISION**

In re:	§	Case No. 22-90000 (MXM)
ROCKALL ENERGY HOLDINGS, LLC, <i>et al.</i>,	§	(Chapter 11)
	§	(Joint Administration Requested)
Debtors.¹	§	

**REQUEST FOR EMERGENCY
 CONSIDERATION OF CERTAIN FIRST DAY MATTERS**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

The above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), file this *Request for Emergency Consideration of Certain First Day Matters* (the “**Request**”) and in support respectfully submit the following:

1. On March 9, 2022 (the “**Petition Date**”), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. Proposed counsel for the Debtors believe that

¹ The Debtors in these chapter 11 cases and the last four digits of their respective federal tax identification numbers are: Arrow Rock Energy, LLC (7549), Petro Harvester Operating Company, LLC (2136), Rockall Agent Corp. (1653), Rockall Energy Holdings, LLC (5784), Rockall Energy, LLC (6340), Rockall EOR, LLC (4136), Rockall Exploration Company, LLC (0547), Rockall Intermediate, Inc. (9759), Rockall LA, LLC (4270), Rockall Laurel, LLC (1178), Rockall Midstream, LLC (0917), Rockall MS, LLC (0740), Rockall ND, LLC (9311), Rockall Pine Prairie, LLC (5799), White Marlin Investment Company, LLC (9987), and White Marlin Midstream, LLC (1466). The location of the Debtors’ U.S. corporate headquarters and the Debtors’ service address is: 5005 LBJ Freeway, Suite 700, Dallas, TX 75244.

the Debtors' chapter 11 cases qualify as "Complex Chapter 11 Cases." The Debtors need emergency consideration of the following initial case matters (collectively, the "**First Day Matters**"):

1. *Emergency Motion for Entry of an Order Directing Joint Administration of the Debtors' Chapter 11 Cases* [Dkt. No. 2];
2. *Notice of Designation as Complex Chapter 11 Bankruptcy Case* [Dkt. No. 3];
3. *Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefit Programs and (II) Granting Related Relief* [Dkt. No. 4];
4. *Emergency Application for Entry of an Order (A) Authorizing the Retention and Appointment of Stretto as Claims and Noticing Agent and (B) Granting Related Relief* [Dkt. No. 5];
5. *Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Prepetition Taxes and Fees and (II) Granting Related Relief* [Dkt. No. 6];
6. *Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Make or Honor Mineral Payments, Working Interest Payments, and Joint Interest Billings Payments and (II) Granting Related Relief* [Dkt. No. 7];
7. *Emergency Motion for Entry of an Order (I) Authorizing the Debtors to (A) File a Consolidated Creditor Matrix; (B) File a Consolidated List of 20 Largest Unsecured Creditors; and (C) Redact Certain Personal Identification Information; and (II) Granting Related Relief* [Dkt. No. 8];
8. *Emergency Motion for Entry of an Order Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, and Statements of Financial Affairs* [Dkt. No. 9];
9. *Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System and Maintain Existing Bank Accounts, (B) Continue Using Existing Checks and Business Forms, (C) Maintain Their Corporate Card Program, and (D) Continue Intercompany Transactions, and (II) Granting Related Relief* [Dkt. No. 10];
10. *Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay (A) Certain Operating Expenses, (B) Marketing Expenses, (C) Shipping and Warehousing Claims, (D) 503(B)(9) Claims, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief* [Dkt. No. 11];

11. *Emergency Motion for Entry of Orders (A)(I) Approving Bidding Procedures, (II) Scheduling the Bid Deadlines and the Auction, (III) Scheduling Hearings and Objection Deadlines With Respect to the Sale, (IV) Approving the Form and Manner of Notice Thereof, (V) Approving Contract Assumption and Assignment Procedures, and (VI) Granting Related Relief; and (B)(I) Approving the Sale of the Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, (II) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases; and (C) Granting Related Relief [Dkt. No. 16];*
12. *Emergency Motion for Entry of an Order (I) Scheduling a Combined Hearing to Consider (A) Approval of the Disclosure Statement and (B) Confirmation of the Plan; (II) Approving the Solicitation and Tabulation Procedures; (III) Approving the Form of Ballots and Notices; and (IV) Granting Related Relief [Dkt. No. 18]; and*
13. *Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) Use Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361, 362, 363 and 364, and (III) Scheduling a Final Hearing [Dkt. No. 21].*

2. The Debtors request that the emergency hearing on the First Day Matters (the “**Hearing**”) be held on March 11, 2022 at 9:30 a.m. (prevailing Central Time) in a hybrid manner, including allowing counsel and other parties in interest to participate (i) in person at the United States Bankruptcy Court for the Northern District of Texas, Room 128, U.S. Courthouse, 501 W. Tenth Street, Fort Worth, Texas, 76102, and (ii) virtually with counsel appearing remotely through the Court’s audio and video conference systems. Participants attending virtually and wishing to both see the documents and exhibits as presented to the Court and hear the proceedings should be 1) dialed in through the audio system, and 2) logged into the Court’s WebEx videoconference facilities. **For Audio Communication:** Audio communication will be by use of the Court’s dial-in number. The dial-in number is 650-479-3207. You will be asked to key in the conference room number. Judge Mullin’s access code number is 474-603-746. Parties are encouraged to review the Court’s procedures and instructions located at: <https://www.txnb.uscourts.gov/content/judge-mark-x-mullin#Telephonic%20Hearing%20Policy>.

For **WebEx** **Video**

Participation/Attendance: You may view video via the Court's WebEx video conference facilities located at: <https://us-courts.webex.com/meet/mullin>.

WHEREFORE, the Debtors respectfully request that the Court enter an order (the "*Order*"), substantially in the form attached hereto as **Exhibit A**.

PRAYER

The Debtors respectfully request that the Court grant the Order, substantially in the form attached hereto as **Exhibit A**, and grant them such other and further relief to which the Debtors may be justly entitled.

Dated: March 10, 2022
Dallas, Texas

/s/ Michael A. Garza

VINSON & ELKINS LLP

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CERTIFICATE OF SERVICE

I certify that on March 10, 2022, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Michael A. Garza
One of Counsel

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORTH WORTH DIVISION**

In re:	§	Case No. 22-90000 (MXM)
	§	
ROCKALL ENERGY HOLDINGS, LLC, <i>et al.</i>,	§	(Chapter 11)
	§	
	§	(Joint Administration Requested)
	§	
Debtors.²	§	Re: Docket No. ____

**ORDER GRANTING EMERGENCY
CONSIDERATION OF CERTAIN FIRST DAY MATTERS**

Upon the Request³ filed by the above-referenced debtors and debtors in possession (collectively, the “**Debtors**”) for entry of an order (the “**Order**”) granting emergency consideration of certain First Day Matters; and the Court having jurisdiction over the matters raised in the Motion

² The Debtors in these chapter 11 cases and the last four digits of their respective federal tax identification numbers are: Arrow Rock Energy, LLC (7549), Petro Harvester Operating Company, LLC (2136), Rockall Agent Corp. (1653), Rockall Energy Holdings, LLC (5784), Rockall Energy, LLC (6340), Rockall EOR, LLC (4136), Rockall Exploration Company, LLC (0547), Rockall Intermediate, Inc. (9759), Rockall LA, LLC (4270), Rockall Laurel, LLC (1178), Rockall Midstream, LLC (0917), Rockall MS, LLC (0740), Rockall ND, LLC (9311), Rockall Pine Prairie, LLC (5799), White Marlin Investment Company, LLC (9987), and White Marlin Midstream, LLC (1466). The location of the Debtors’ U.S. corporate headquarters and the Debtors’ service address is: 5005 LBJ Freeway, Suite 700, Dallas, TX 75244.

³ Capitalized terms used but not otherwise defined herein shall have the meaning set forth in the Request.

pursuant to 28 U.S.C. § 1334; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Motion is in the best interests of the Debtors and their respective estates, creditors, and other parties in interest; and the Court having found that due and proper notice to parties in interest was appropriate under the circumstances; and the Court having found that good and sufficient cause exists for the granting of the relief requested in the Request after having given due deliberation upon the Request, it is HEREBY ORDERED THAT:

1. The Request is GRANTED.
2. It is further ORDERED that the Hearing will be held on March 11, 2022 at 9:30 a.m. (prevailing Central Time).
3. Counsel and other parties in interest may participate (i) in person at the United States Bankruptcy Court for the Northern District of Texas, Room 128, U.S. Courthouse, 501 W. Tenth Street, Fort Worth, Texas, 76102, or (ii) virtually through the Court's audio and video conference systems. Participants attending virtually and wishing to both see the documents and exhibits as presented to the Court and hear the proceedings should be 1) dialed in through the audio system, and 2) logged into the Court's WebEx videoconference facilities. **For Audio Communication:** Audio communication will be by use of the Court's dial-in number. The dial-in number is 650-479-3207. You will be asked to key in the conference room number. Judge Mullin's access code number is 474-603-746. Parties are encouraged to review the Court's procedures and instructions located at: <https://www.txnb.uscourts.gov/content/judge-mark-x-mullin#Telephonic%20Hearing%20Policy>. **For WebEx Video Participation/Attendance:** You may view video via the Court's WebEx video conference facilities located at: <https://uscourts.webex.com/meet/mullin>.

END OF ORDER # #

Order submitted by:

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